1 2	PATRICK H. HICKS, ESQ., Bar # 4632 AMY L. THOMPSON, ESQ., Bar # 11907 LITTLER MENDELSON, P.C.		
3	3960 Howard Hughes Parkway Suite 300		
4	Las Vegas, NV 89169-5937 Telephone: 702.862.8800		
•	Fax No.: 702.862.8811 Emails: phicks@littler.com		
5	athompson@littler.com		
6	Attorneys for Plaintiff AHERN RENTALS, INC.		
7	MIERO REIVITES, IIVE.		
8	LINITED STA	TES DISTRICT COURT	
9	DISTRICT OF NEVADA		
10	DISTRI	ICT OF NEVADA	
11	ALIEDNI DENITAL C. INC.		
12	AHERN RENTALS, INC.,	Case No.: 2:20-cv-00094-JAD-VCF	
13	Plaintiff,	STIPULATION AND	
14	VS.	ORDER FOR PRELIMINARY INJUNCTION	
15	KEITH WADE, an individual; JESSIE WADE, an individual;	ECE No. 10 15	
16	EQUIPMENTSHARE.COM, INC.; DOES I-X, inclusive; and ROES I-X, inclusive,	ECF Nos. 10, 15	
17	Defendants.		
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19			
20	Plaintiff, Ahern Rentals, Inc. ("Ahern"), and Defendants Keith Wade, Jessie Wade, and		
21	EquipmentShare.com, Inc. ("EquipmentShare"), by and through their undersigned counsel, and		
22	without admission, waiver, or acknowledgment of any claim, defense, or allegation by any party, and		
23	solely for the purpose of maintaining the status quo by mutual agreement of the parties, enter into the		
24	following stipulated preliminary injunction:		
25	1. Keith Wade and Jessie Wade shall abide by the non-solicitation and confidentiality		

obligations of their Employment Agreements with Ahern until a final adjudication on the merits;

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- 2. EquipmentShare shall not direct or encourage the Wades to solicit Ahern employees and shall not direct or encourage the Wades to utilize any confidential or proprietary information of Ahern for the benefit of EquipmentShare, or to provide any such confidential information to EquipmentShare, to the extent the Wades are in possession of, or have access to, such confidential information, with such injunctive relief set forth in this paragraph lasting until a final adjudication on the merits;
- 3. Keith Wade and Jessie Wade shall turn over to Ahern, and cease any use of, Ahern's confidential information, to the extent they are in possession of, or have access to, such confidential information and, to the extent Keith Wade or Jessie Wade have provided any such confidential information to EquipmentShare, EquipmentShare shall turn over to Ahern, and cease use of, that information.
- 4. Defendants shall preserve any and all paper and electronic data or information having any relevance or potential relevance to the allegations in or potential defenses to the allegations in the Complaint; and

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1	5. Ahern will not be required to post any security or bond for the injunction.	
2	7 mem will not be required to post	any security of condition the injunetion.
3	Dated: January 31, 2020	Dated: January 31, 2020
4	Respectfully submitted,	Respectfully submitted,
5		
6 7 8 9 10 11 12 13 14 15 16	/s/ Mitchell J. Langberg MITCHELL J. LANGBERG, ESQ. BROWNSTEIN HYATT FARBER SCHRECK MICHAEL E. BREWER, ESQ. (pro hac vice) BAKER & MCKENZIE LLP Attorneys for Defendant EQUIPMENTSHARE.COM INC. Dated: January 31, 2020 Respectfully submitted, /s/ Aviva Y. Gordon AVIVA Y. GORDON, ESQ.	PATRICK H. HICKS, ESQ, ESQ. AMY L. THOMPSON, ESQ. LITTLER MENDELSON, P.C. Attorneys for Plaintiff AHERN RENTALS, INC.
16 17 18 19	GORDON LAW Attorney for Defendants KEITH and JESSIE WADE	
20	ORDER	
21 22	Based on the parties' stipulation [ECF No. 15] and good cause appearing, IT IS SO ORDERED. The Emergency Motion for Preliminary Injunction [ECF No. 10] is DENIED as moot, and the 2/6/2020 hearing on that motion [ECF No. 11] is VACATED.	
23		Dores
24		U.S. District Judge Jennifer A. Dorsey Dated: February 3, 2020
25		Dated. Peditiary 3, 2020
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